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8 **UNITED STATES DISTRICT COURT**  
9 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
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11 IN RE: SOCIAL MEDIA ADOLESCENT  
12 ADDICTION/PERSONAL INJURY  
13 PRODUCTS LIABILITY LITIGATION

MDL No. 3047

Case Nos.: 4:22-md-03047-YGR-PHK

14 THIS DOCUMENT RELATES TO:  
15 ALL ACTIONS

**DECLARATION OF MATTHEW  
K. DONOHUE IN SUPPORT OF  
OMNIBUS SEALING  
STIPULATION REGARDING  
DKT. NO. 1778**

Judge: Hon. Yvonne Gonzalez Rogers  
Magistrate Judge: Hon. Peter H. Kang

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19 I, Matthew K. Donohue, declare as follows:

20 1. I am an attorney at the law firm of Wilson Sonsini Goodrich & Rosati and  
21 attorney of record for Defendants YouTube, LLC and Google LLC (collectively (“YouTube”) in  
22 *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*, Case  
23 No.: 4:22-md-03047-YGR-PHK. I am licensed to practice law in the state of California and am  
24 admitted to practice before this Court. I submit this declaration in support of the Omnibus  
25 Sealing Stipulation in connection with the Parties’ Joint Letter Brief re YouTube 30(b)(6)  
26 Dispute (ECF No. 1778). I have personal knowledge of the facts set forth in this declaration, and  
27 I could and would testify competently to their truth if called upon to do so.  
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2. On March 18, 2025, the Parties filed the Parties' Joint Letter Brief re YouTube 30(b)(6) Dispute (ECF No. 1778).

3. I have reviewed the documents that YouTube seeks to seal pursuant to the Court's Order Granting Motion to File Under Seal; Setting Sealing Procedures (ECF No. 341). Based on my review of the documents and in consultation with YouTube, I understand there is good cause to seal the following information:

Dkt. No.	Description	Basis for Sealing
1778-2	Exhibit A to Joint Letter Brief re YouTube 30(b)(6) Dispute	The redacted portions consist of sensitive and confidential information about YouTube's platform, repository, and tool design. Disclosure of the information would provide competitors with insights into YouTube's business they would not otherwise have, include trade secrets and competitive information, and thereby cause competitive harm to YouTube.
1778-5	Exhibit C to Joint Letter Brief re YouTube 30(b)(6) Dispute	The redacted portions consist of the names of employees who are not parties to this action. I understand that Google employees could be exposed to unwanted attention, solicitation or harassment, including by individuals who conflate the allegations against the company in this litigation with allegations against specific individuals and that Google employees have previously been harassed, receiving unsolicited contact with threatening messages, because of the public release of their names and titles. If the proposed and designated custodians' personal identifying information was shared on the public docket in this case, it could similarly subject them to unwarranted or potentially threatening contact.
1778-7	Exhibit D to Joint Letter Brief re YouTube 30(b)(6) Dispute	The redacted portions consist of sensitive and confidential information about YouTube's platform, repository, and tool design. Disclosure of the information would provide competitors with insights into YouTube's business they would not otherwise have, include trade secrets and competitive information, and thereby cause competitive harm to YouTube.
1778-9	Exhibit E to Joint Letter Brief re YouTube 30(b)(6) Dispute	The redacted portions consist of sensitive and confidential information about YouTube's platform, repository, and tool design. Disclosure of the information would provide competitors with insights into YouTube's business they would not otherwise have, include trade secrets and competitive information, and thereby cause competitive harm to YouTube.

1 I declare under penalty of perjury under the laws of the State of California that the  
2 foregoing is true and correct. Executed at Los Angeles, California on April 1, 2025.

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4 /s/ Matthew K. Donohue  
5 Matthew K. Donohue  
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